

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

DR. WENDI H. ANDERSON,

Plaintiff,

v.

Case No. 3:18-cv-745

SCHOOL BOARD OF GLOUCESTER COUNTY

Defendant.

**MOTION FOR SANCTIONS UNDER RULE 37(b)(2)**

Defendant School Board of Gloucester County (“School Board”), by counsel, pursuant to Rule 37(b)(2)(A)(i) and (b)(2)(C) of the Federal Rules of Civil Procedure, respectfully moves the Court to enter an Order sanctioning Plaintiff and finding the following facts to be established for purposes of this action: (1) Plaintiff filed her Complaint outside of the 90-day limitations period; and (2) equitable tolling does not apply in this case.

For the reasons set forth in the accompanying Memorandum in Support, the School Board respectfully requests that the Court enter an Order granting its Motion for Sanctions, awarding the School Board reasonable attorneys’ fees in connection with the filing of this Motion for Sanctions, and granting it such further relief as the Court may deem appropriate.

Date: August 28, 2020

Respectfully Submitted,

SCHOOL BOARD OF GLOUCESTER COUNTY

By Counsel

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**CERTIFICATE OF SERICE**

I hereby certify that on the 28th day of August, 2020, I have electronically filed the foregoing using the CM/ECF system, which will automatically send email notification of such filing to counsel of record as follows:

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